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June 27, 1996

VIA HAND DELIVERY


Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: ET Docket 94-124

Dear Mr. Caton:

Pursuant to Sections 1.415 and 1.419 of the Commission's Rules, enclosed are an original and 9 copies of Reply Comments to be filed with the FCC's Office of the Secretary by General Motors Corporation on its own behalf and on behalf of one of its subsidiaries, Hughes Electronics Corporation, in response to the Second Notice of Proposed Rulemaking in the above-referenced docket. Also enclosed is a Confirmation Copy. Please date-stamp and return to the messenger.

Sincerely,


Erika Z. Jones

cc: Lois Williams
Nick Morenc

Enclosures

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Before the
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REPLY COMMENTS OF
GENERAL MOTORS CORPORATION
and
HUGHES ELECTRONICS CORPORATION

In the Matter of
ET Docket 94-124

SECOND NOTICE OF PROPOSED RULE MAKING

General Motors Corporation respectfully submits these reply comments on its own behalf and on behalf of one of its subsidiaries, Hughes Electronics Corporation, in response to comments filed by the Committee on Radio Frequencies of the National Research Council in response to the 2nd Notice of Proposed Rule Making ("NPRM") in FCC ET Docket 94-124. GM is aware that the American Automobile Manufacturers Association is filing reply comments as well, and GM endorses those comments.

The Committee on Radio Frequencies (CORF) urges the FCC to establish an out-of-band emissions limit of 2 pW/cm² to be measured at a distance of 3 m, measured over the 200-231 GHz band. GM opposes the CORF proposal, and urges the Commission instead to adopt the proposal in the 2nd NPRM to limit emissions in the 200-231 GHz band to 1000 picoWatts/cm squared (1000 pW/cm²). (See 2nd NPRM ¶65.)

As discussed in more detail in GM's comments to Second Notice of Proposed Rulemaking, the proposed limit of 1000

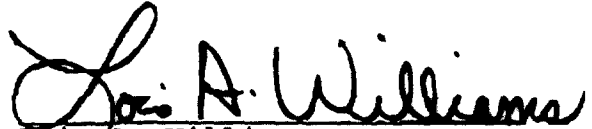
pW/cm² evolved as a compromise to address the radio astronomers' concerns that had been raised during the rulemaking proceeding that led to the First Report and Order. According to the Second Notice of Proposed Rulemaking, NTIA recommended the 1000 pW/cm² limit "to prevent interference to radio astronomy operations in the 217-231 GHz band." (See 2nd NPRM at ¶65.) GM agreed to support the proposed compromise limits, notwithstanding its concerns about the practicability of measuring and verifying strict out-of-band emission limits for consumer electronics products. GM cannot, however, support more stringent out-of-band emission limits for the 200-231 GHz band, because neither the need for, nor the feasibility and practicability of, such stringent limits has been shown.

As GM observed in its Comments to the Second Notice of Proposed Rulemaking, it is inappropriate to set standards that cannot be verified at existing commercial test facilities, cannot be measured by existing commercial test equipment, or cannot be measured at NIST or at the FCC. The proposed standard of 1000 pW/cm², while still being difficult to measure, is closer to the capabilities of existing equipment, and is closer to actual levels expected based on extrapolation of measurements made at lower frequencies. The CORF proposal would most probably require the use of waveguide filters, which would substantially increase the cost of the vehicle radar systems, and could

delay (or interrupt) the availability of vehicular radar systems in the market, because systems would have to be redesigned to attempt to comply with the stricter limits.

In GM's view, any such delay or interruption in providing vehicle radar systems would be contrary to the public interest

Respectfully submitted,



Lois A. Williams
Vice President
GENERAL MOTORS RESEARCH
CORPORATION
and
Senior Telecommunications
Specialist
GENERAL MOTORS CORPORATION

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June 28, 1996

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